

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., et al.	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
Debtors.	)	
	)	

**DEBTORS' MOTION FOR EXPEDITED CONSIDERATION OF AGREED JOINT  
MOTION FOR ENTRY OF PROTECTIVE ORDER**

Debtors hereby request that the Court consider the Agreed Motion for Entry of Protective Order, which will govern the production of documents, data, and other responsive information by the Nonparty National Institute for Occupational Safety and Health ("NIOSH") pursuant to a Rule 45 subpoena served by W.R. Grace & Co., on an expedited basis and rule on the Motion without the need for any hearing.

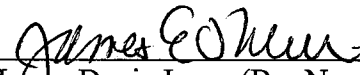
Expedited consideration and resolution is warranted because the Motion is an agreed motion between NIOSH and Grace. Further, prompt resolution of the Motion is necessary so that NIOSH may begin to product documents, data, and other responsive information as soon as possible. The information that NIOSH expects to produce is necessary to Grace's expert analysis. With supplemental expert reports due in less than two months, time is of the essence and entry of the agreed Protective Order is necessary.

While Grace does not expect any objections to the entry of the protective order will be made, if the Court believes that an objection period is necessary, Grace respectfully requests that the Court require any objection to be made within 5 days of the Court granting this Motion for Expedited Consideration.

WHEREFORE, W.R. Grace & Co. respectfully requests that this Court grant this motion for expedited consideration, order that any objections to the entry of the protective order be made within 5 days, and approve the motion for entry of the protective order at the Court's earliest convenience thereafter.

Dated: August 20, 2007

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